UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(SN)

ECF Case

This document relates to:

Laurence Schlissel et al. v. Islamic Republic of Iran, No. 1:18-cv-05331 (GBD) (SN)

NOTICE OF MOTION

PLEASE TAKE NOTICE that Plaintiffs in the above-referenced matter, by undersigned counsel and in accordance with F.R.C.P. 15, respectfully request that this Court grant Plaintiffs' Motion for Leave to Amend to Correct Errors. No adverse parties have appeared in this proceeding, and the Clerk issued a Certificate of Default on January 24, 2019.

In support of this motion, Plaintiffs submit the following memorandum of law and a proposed order.

Dated: August 5, 2019

/s/ Jerry S. Goldman

ANDERSON KILL P.C. Jerry S. Goldman, Esq. Bruce E. Strong 1251 Avenue of the Americas New York, NY 10020

Tel: 212-278-1000 Fax: 212-278-1733

Email: jgoldman@andersonkill.com

Arthur R. Armstrong, Esq. (pro hac vice) 1760 Market Street, Suite 600 Philadelphia, PA 19103

Tel: 267-216-2711 Fax: 215-568-4573

Email: aarmstrong@andersonkill.com

Attorneys for Plaintiffs